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January 8, 2010

BY FACSIMILE AND OVERNIGHT MAIL

The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, N.Y. 10007

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The request for a sixty (60)
day extension of Hs. Turk's
surrender date is granted.
Defense counsel should with
The USHS and for The BOP.

n Kann

United States v. Ivy Woolf Turk 07 Cr. 1062 (NRB)

January 11, 2010

Dear Judge Buchwald:

We write as counsel to Ivy Woolf Turk, defendant in the above matter, to request a sixty day adjournment of the date by which Ms. Woolf Turk must surrender to begin serving her sentence. The basis for the request is set forth in the accompanying letter of Dr. Karen Schwartz, an endocrinologist who has been treating Ms. Woolf Turk since 2001. The additional time is needed to transition Ms. Woolf Turk from a course of drug treatment she has been on since approximately 2001 to drugs that are permitted by the Bureau of Prisons.

As detailed in the PSR (at ¶69) (copy enclosed), Ms. Woolf Turk was treated for uterine cancer in 2002. A hysterectomy was followed by hormone replacement therapy intended to address Ms. Woolf Turk's extreme reaction to the sudden loss of hormones. As Dr. Schwartz explains, the choice of hormones that could be prescribed was limited by a number of factors, including the underlying cancer and Ms. Woolf Turk's reaction to many of the typical synthetic hormone options.

Unfortunately, the combination of drugs being used, in particular, testosterone, is not available by the rules of the Bureau of Prisons. As such, new drugs must be found. Because of Ms. Turk's risk factors, especially her increased exposure to stroke and heart attack, this transition must be done with constant monitoring. It would be far safer if that transition were done out of custody and by her long term treating physician.

GERALD B. LEFCOURT, P.C.

The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York United States Courthouse January 8, 2010 Page 2

I also want to address the timing of this application. Ms. Woolf Turk was initially advised that the drugs she was taking would be available in prison. It was not until December 28, 2009, that she learned otherwise. Dr. Schwartz was away and it was not until earlier this week that she was able to get an emergency appointment. There was no intent to delay the surrender date by delaying the visit to the doctor.

For these reasons, we respectfully request that the surrender date be extended by sixty days.

Respectfully submitted,

cc: Harry Chernoff, Esq. (by e-mail)